

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

<b>JOHN GIDDIENS,</b>	)	
<b>on behalf of himself and all others</b>	)	
<b>similarly situated</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>C.A. No. 12-cv-02624-LDD</b>
<b>v.</b>	)	
	)	<b>CLASS ACTION</b>
<b>FIRST ADVANTAGE LNS SCREENING</b>	)	
<b>SOLUTIONS, INC, F/K/A LEXISNEXIS</b>	)	
<b>SCREENING SOLUTIONS, INC.</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

**MOTION TO PERMIT FILING OF DOCUMENTS IN SUPPORT OF PLAINTIFF’S  
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT UNDER SEAL**

Plaintiff John Giddiens, by counsel, respectfully requests that the Court enter the attached proposed Order permitting the filing under seal of certain documents relating to Plaintiff’s Motion For Final Approval of Class Action Settlement (“Motion”), and assigns the following reasons in support thereof.

1. In accordance with the Protective Order of this Court entered December 20, 2012 (Doc. 21), Defendant First Advantage LNS Screening Solutions, Inc., f/k/a LexisNexis Screening Solutions, Inc. (“Defendant” or “LNSSI”) has marked certain documents and deposition testimony as “Confidential.”

2. Plaintiff seeks to file the following material that has been marked as confidential in support of the Motion: select portions of the transcript of the deposition of Defendant’s corporate representative Charles Oyler (attached to the Motion as Exhibit A), and select portions of Defendant’s Supplemental Response to Plaintiff’s Interrogatory No. 8 (attached to the Motion as Exhibit B).

3. Pursuant to the Protective Order, at paragraph 14, and Local Rule 5.1.5(a)(2), documents in this case may be filed under seal only if the Court first enters an Order allowing the filing under seal.

WHEREFORE, Plaintiff John Giddiens respectfully requests that this Honorable Court grant this Motion and enter an Order in the form proposed herewith, permitting Plaintiff to file under seal documents designated as “Confidential.”

Dated: November 21, 2014

Respectfully submitted,

**FRANCIS & MAILMAN, P.C.**

By: /s/ James A. Francis  
JAMES A. FRANCIS  
DAVID A. SEARLES  
JOHN SOUMILAS  
LAUREN KW BRENNAN  
Land Title Building, 19<sup>th</sup> Floor  
100 South Broad Street  
Philadelphia, PA 19110

Sharon M. Dietrich  
Brendan Patrick Lynch  
COMMUNITY LEGAL SERVICES, INC.  
1424 Chestnut St.  
Philadelphia, PA 19102

*Attorneys for Plaintiff and the Class*

This matter is before the Court on the Plaintiff's Motion to Permit Filing Under Seal of certain documents designated as "Confidential" relating to Plaintiff's Motion for Final Approval of Class Action Settlement contained in Exhibits A and B attached thereto. Upon consideration of this matter, the Court hereby ORDERS that the Motion is GRANTED.

**BY THE COURT:**

LEGROME D. DAVIS, U.S.D.C.

**CERTIFICATE OF SERVICE**

I, **JAMES A. FRANCIS**, do hereby certify that, on this date, I caused a true and correct copy of the foregoing to be served via the Court's ECF Notification system upon all counsel of record.

/s/ James A. Francis

JAMES A. FRANCIS

Dated: November 21, 2014